

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
FAYETTEVILLE DIVISION**

IN RE:

**FIRST BAPTIST HOUSING
DEVELOPMENT CORPORATION**

**CASE NO. 18-05719-5-DMW
CHAPTER 11**

DEBTOR.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR
APPOINTMENT OF FINANCIAL MONITOR AND TO HOLD REMAINING
INSURANCE PROCEEDS IN ESCROW**

NOW COMES the Debtor, First Baptist Housing Development Corporation (the “Debtor”), by and through undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6, made applicable to this proceeding by the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the Eastern District of North Carolina, and hereby requests entry of an Order extending the deadline, within which the Debtor is to respond to Motion for Appointment of Financial Monitor and to Hold Remaining Insurance Proceeds in Escrow filed by Skyline Restoration, Inc. (hereinafter “Motion”) in the above-captioned matter, by not less than seven (7) days, up to and including March 4, 2019. In support hereof, the Debtor shows unto this Court as follows:

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and it is core proceeding pursuant to 28 U.S.C. § 157(b)(2). This Court, likewise, has authority to hear this matter pursuant to the General Order of Reference entered by the United States District Court for the Eastern District of North Carolina on August 3, 1984.

2. The Debtor filed a voluntary petition seeking relief under chapter 11 of the Bankruptcy Code on November 28, 2018, and is a Debtor in Possession.

3. Currently, the deadline by which the Debtor is required to respond to the Motion is February 25, 2019. Thus, this request—having been made prior to said deadline—is timely

and in accordance with the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure.

4. Counsel for the Debtor is in need of additional time to properly prepare a response to the Motion.

5. Accordingly, and based upon the foregoing, the Debtor requests that the Court extend the applicable deadline, within which the Debtor is respond to the Motion by not less than seven (7) days, up to and including March 4, 2019.

6. The relief requested herein is made for good cause and not for purposes of delay.

WHEREFORE, based upon the foregoing, the Debtor respectfully requests that the *Motion for Extension of Time to Respond to Motion for Appointment of Financial Monitor and to Hold Remaining Insurance Proceeds in Escrow filed by Skyline Restoration, Inc.* be **ALLOWED** and for entry of an Order granting the Debtor an extension of 7-days, to and including March 4, 2019 within which to respond to the Motion, and allowing such further relief as the Court deems necessary and proper.

Respectfully submitted this, the 25th day of February, 2019.

STUBBS & PERDUE, P.A.

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Counsel for Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies, that on the 25th day of February, 2019, a true and accurate copy of the foregoing was electronically filed with the CM/ECF system, copies of which were remitted to the following CM/ECF participants:

Brian Behr
BANKRUPTCY ADMINISTRATOR

The undersigned further certifies that a true and accurate copy of the foregoing was deposited with the United States Postal Service in an envelope, bearing sufficient postage for mailing via first-class mail delivery, properly addressed as follows:

First Baptist Housing Development Corp.
Attn: Wixie Stephens, Chairperson
Board of Trustees
504 West 2nd Street
Lumberton, NC 28358

Gregory P. Chocklett
Law Offices of Gregory Chocklett
711 Harvey Street
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Counsel for Skyline

Executed this, the 25th day of February, 2019.

s/William H. Kroll

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